

Exhibit B

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KARUNAMUNIGE CHAMILA
KRISHANTHI, *et al.*,

Plaintiffs,

v.

RAJAKUMARA RAJARATNAM, *et al.*

Defendants.

Civil Action No. 09-5395(JLL)(JSA)

PROPOSED SCHEDULING ORDER

THIS MATTER, having been brought before the Court by its own Order, directing that Defendants, Rajakumara Rajaratnam and the Estate of Jesuthasan M. Rajaratnam, jointly with Plaintiffs, Karunamunige Chamila Krishanthi, *et al.*, submit a joint proposed scheduling order for the remainder of Phase I Discovery, ECF No. 445; and the parties having been unable to reach agreement; and for other good cause shown,

IT IS on this ____ day of _____, 2021, hereby

ORDERED that the Former JTTF Agents and Plaintiffs shall resolve any deficiencies in connection with the production of documents responsive to the subpoenas issued on June 18, 2018, within twenty-one (21) days of this Order; and it is further

ORDERED that after the expiration of fourteen (14) days from the earliest of (i) the date that the Former JTTF Agents and Plaintiffs resolve the remaining deficiencies with the agreement of Defendant, or (ii) the expiration of the time period set forth above for resolution of such issues, Defendants shall raise to the Court any privilege or production issues that remain unresolved regarding the January 15, 2021 document production and associated privilege assertions; and it is further

ORDERED that within thirty (30) days of the Court's resolution of such issues, and the production of any additional documents and an updated privilege log as may be ordered by the Court, Defendants shall complete the deposition of the Confidential Source; and it is further

ORDERED that the parties shall disclose the names of any affirmative experts, and the subject(s) upon which they will be offering opinions, within fifteen (15) days of the conclusion of the Confidential Source's deposition; the parties may not offer other experts or reports other than those that are responsive to these disclosed experts addressing the disclosed subject(s); and it is further

ORDERED that the parties shall serve expert reports, to the extent permitted by the Court, within forty-five (45) days of the conclusion of the Confidential Source's deposition; and it is further

ORDERED that the parties shall serve any responsive expert disclosures and report(s), to the extent permitted by the Court, within forty-five (45) days of receipt of affirmative expert report(s); and it is further

ORDERED that the depositions of any experts shall be concluded within forty-five (45) days of receipt of Defendants' responsive expert report; and it is further

ORDERED that dispositive motions regarding Phase I liability shall be filed within forty-five (45) days of the completion of any Phase I expert discovery; opposition shall be filed within forty-five (45) days; and any reply shall be filed within twenty (20) days.

Hon. Jessica S. Allen, U.S.M.J.